

Orion Corporation

Code of Conduct

1. Ethical Principles

Orion Corporation is committed to conducting its business with integrity, transparency, and accountability. All employees, officers, and directors are expected to uphold these principles.

2. Conflicts of Interest

A conflict of interest arises when personal, financial, or professional interests could reasonably be perceived to influence decision-making. Such conflicts must be disclosed promptly and updated as circumstances change.

Failure to disclose does not imply absence of conflict.

3. Accountability and Responsibility

Leaders are responsible for ensuring decisions are documented, communicated, and executed in accordance with governance expectations.

4. Reporting and Non-Retaliation

Employees are encouraged to report ethical concerns without fear of retaliation. Reports may be escalated to governance or risk leadership as appropriate.